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2013 SEP 26 PM 4:17

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2012 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT J. ALGUIRE and  
PHILLIP LAURENCE COOPER,

Defendants.

CR13-0706

CR No. 13-

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;  
18 U.S.C. § 641: Conversion of  
Government Property; 18 U.S.C.  
§ 912: False Impersonation;  
18 U.S.C. § 2(a): Aiding and  
Abetting]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. The United States Forest Service ("Forest Service")  
was an agency of the United States Department of Agriculture  
established by Congress in 1905 to provide quality water and  
timber for the nation's benefit. The Forest Service was

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1 responsible for managing national forest resources in a way that  
2 benefitted the American people while at the same time ensuring  
3 the productivity of the land and protecting the quality of the  
4 environment.

5       2. The Los Padres National Forest ("the forest") was a  
6 1,950,000 acre national forest located in southern and central  
7 California and included most of the mountainous land along the  
8 California coast from Ventura to Monterey. Roughly 88 percent of  
9 the forest was public lands, while the remainder consisted of  
10 privately owned holdings. The forest was divided into five  
11 administrative units called "Ranger Districts," with offices in  
12 King City, Santa Maria, Santa Barbara, Ojai, and Frazier Park.

13       3. A forest ranger was a Forest Service employee entrusted  
14 with protecting and preserving national forests.

15       4. A Law Enforcement Officer ("LEO") was a Forest Service  
16 employee and sworn federal law enforcement officer. An LEO was  
17 authorized to enforce federal and state criminal laws and forest  
18 regulations, carry firearms, make arrests, and execute search  
19 warrants.

20       5. Defendant SCOTT J. ALGUIRE ("ALGUIRE") was employed by  
21 the Forest Service as the Los Padres National Forest Fleet  
22 Manager, with an office in the Santa Lucia Ranger District. As  
23 fleet manager, defendant ALGUIRE was responsible for maintaining  
24 and assigning Forest Service vehicles, including law enforcement  
25 vehicles.

26       6. Defendant PHILLIP LAURENCE COOPER ("COOPER") was an  
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1 associate of defendant ALGUIRE. Defendant COOPER held no active  
2 law enforcement position of any kind, and he had no law  
3 enforcement authority.

4 7. These Introductory Allegations are hereby incorporated  
5 by reference into each count of this Indictment as though set  
6 forth fully therein.

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COUNT ONE

[18 U.S.C. § 371]

A. OBJECTS OF THE CONSPIRACY

In or about September 2011, in Santa Barbara and San Luis Obispo Counties and elsewhere, within the Central District of California, defendants ALGUIRE and COOPER, and others known and unknown to the Grand Jury, knowingly conspired and agreed with each other to (1) knowingly embezzle, steal, purloin, and convert to the use of defendant COOPER property belonging to the Forest Service, an agency of the United States, in violation of Title 18, United States Code, Section 641; and (2) falsely assume and pretend to be an officer and employee acting under the authority of an agency of the United States, that is, the Forest Service, in violation of 18 U.S.C. § 912.

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished in substance as follows:

1. The manager of a ranch with property bordering the Los Padres National Forest (the "Ranch") would complain to defendant COOPER about hunters trespassing and poaching on the Ranch.
2. Defendant ALGUIRE, as fleet manager for the forest, would have access to, and control over vehicles belonging to the Forest Service, including marked law enforcement vehicles.
3. Defendant ALGUIRE would provide a marked law

1 enforcement vehicle belonging to the Forest Service to defendant  
2 COOPER for defendant COOPER to use to deter hunters from  
3 trespassing and poaching on the Ranch.

4 4. Defendant COOPER would use the marked law enforcement  
5 vehicle belonging to the Forest Service to patrol areas near the  
6 borders of the Ranch and the Forest. In patrolling these areas,  
7 defendant COOPER would carry firearms, both on his person and  
8 visible in the law enforcement vehicle.

9 5. Using the law enforcement vehicle belonging to the  
10 Forest Service, defendant COOPER would stop and question visitors  
11 found near the Ranch, including individuals driving on public  
12 access roads to forest service lands. Defendant COOPER would ask  
13 the individuals for personal identifying information, including  
14 driver's license numbers, dates of birth, and home addresses.

15 6. When not using the law enforcement vehicle belonging to  
16 the Forest Service, defendant COOPER would park and leave it on  
17 the Ranch's property.

18 C. OVERT ACTS

19 In furtherance of the conspiracy and to accomplish the  
20 objects of the conspiracy, defendants ALGUIRE and COOPER, and  
21 others known and unknown to the Grand Jury, committed various  
22 overt acts within the Central District of California, including  
23 but not limited to the following:

24 1. In or about September 2011, defendant ALGUIRE  
25 delivered a marked law enforcement vehicle belonging to the  
26 Forest Service to defendant COOPER for defendant COOPER's use in  
27 patrolling private property.

28 2. On or about September 18, 2011, while driving the

1 marked law enforcement vehicle belonging to the Forest Service,  
2 defendant COOPER stopped J.P. and asked J.P. for his name and  
3 driver's license number.

4 3. On or about September 25, 2011, defendant COOPER, while  
5 driving the marked law enforcement vehicle belonging to the  
6 Forest Service, stopped W.B. and asked W.B. for his name and home  
7 address.

8 4. On or about September 25, 2011, defendant COOPER, while  
9 driving the marked law enforcement vehicle belonging to the  
10 Forest Service, stopped W.B. and recorded his motorcycle license  
11 plate number.

12 5. On or about September 25, 2011, while driving the  
13 marked law enforcement vehicle belonging to the Forest Service,  
14 defendant COOPER stopped R.M. and asked to see R.M.'s driver's  
15 license.

16 6. On or about September 25, 2011, while driving the  
17 marked law enforcement vehicle belonging to the Forest Service,  
18 defendant COOPER identified himself to R.M. as "law enforcement."

19 7. On or about September 25, 2011, while driving the  
20 marked law enforcement vehicle belonging to the Forest Service,  
21 defendant COOPER stopped D.C. and asked to see D.C.'s  
22 identification.

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COUNT TWO

[18 U.S.C. § 641]

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3 In or about September 2011, in Santa Barbara and San Luis  
4 Obispo Counties, within the Central District of California,  
5 defendant ALGUIRE knowingly embezzled, stole, purloined, and  
6 converted to the use of another property, that is, a law  
7 enforcement vehicle belonging to the Forest Service, an agency of  
8 the United States. More specifically, defendant ALGUIRE provided  
9 a marked law enforcement vehicle having a value exceeding \$1000,  
10 namely, approximately \$7000, to Phillip Laurence Cooper  
11 ("Cooper") for Cooper's use in patrolling private property.  
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COUNT THREE

[18 U.S.C. §§ 912, 2(a)]

In or about September 2011, in Santa Barbara and San Luis Obispo Counties, within the Central District of California, defendant COOPER, aided and abetted by defendant ALGUIRE, falsely assumed and pretended to be an officer and employee acting under the authority of an agency of the United States, that is, the Forest Service, and did act as such.

A TRUE BILL

151  
Foreperson

ANDRÉ BIROTTE JR.  
United States Attorney

*Norm*  
*Donny C. Kim*  
*Dep-Chief, Crim. Div. F.O.R.*  
ROBERT E. DUGDALE

Assistant United States Attorney  
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Chief, Public Corruption and Civil Rights Section